

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

13 CHASOM BROWN, WILLIAM BYATT,  
14 JEREMY DAVIS, CHRISTOPHER  
15 CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

V.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING  
MOTION TO SEAL**

Judge: Hon. Susan van Keulen

## [PROPOSED] ORDER

Before the Court is Plaintiffs' Administrative Motion to Consider Whether Portions of Plaintiffs' Request for an Order to Show Cause re: Sanctions (Dkt. 510) ("Motion").

Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document	Text To Be Sealed	Basis for Sealing Portion of Document
Plaintiffs' Administrative Motion to File Supplement in Support of Their Motion for Order For Google To Show Cause for Why It Should Not Be Sanctioned for Discovery Misconduct	GRANTED as to the portions at: 1:6, 1:8-13, 1:21, 1:24-2:1, 2:5-6, 2:8-10, 3:5-6, 3:12, 3:14, 3:16, 4:6, 4:8, 4:10-11, 4:13, 4:17, 4:19, 4:24-26, 5:1, 5:3-5, 5:10, 5:12, 5:25-26	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals, and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Declaration of Mark C. Mao in Support of Plaintiffs'	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Administrative Motion to File Supplement in Support of Their Request for Order to Show Cause Motion	1:15, 1:18, 1:20-24, 2:1, 2:13, 2:23, 3:2-3, 3:17, 3:22, 3:27, 4:2-5, 4:9-11, 4:13-15, 4:17, 4:21	confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
20 21 22 23 24 25 26 27 28	Mao Decl., Exhibit 1 (GOOG-BRWN-00536949)	GRANTED as to the portions at:  Entirety	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals

		<p>Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Mao Decl., Exhibit 2  GRANTED as to the portions at:  Entirety	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals, and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity</p>

		threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Mao Decl., Exhibit 3 (Excerpts of the Deposition Transcript of Dr. Caitlin Sadowski)  GRANTED as to the portions at:  18:23-24, 19:6-7, 19:10, 22:2-3, 23:8-9, 23:21-22, 24:2, 24:8-9, 64:11-12, 65:1, 66:15-20, 67:25-68:1, 68:6-8, 68:17-19, 68:22-23, 69:5-6, 69:8-10, 69:15-16, 69:25-70:1, 70:3, 70:5-6, 70:18, 70:21, 70:23, 71:8-72:2, 72:20-25, 73:5-6, 73:14-15, 73:17-22, 74:1-3, 74:6-8, 74:10, 74:17-18, 74:25, 75:1, 75:17-20, 75:24-25, 76:1-2, 76:13-14, 76:24-25, 77:20-23, 78:3-4, 78:13-14, 80:8-9, 80:13, 80:16, 80:24, 81:3-5, 81:7, 81:12-14, 82:6-8, 82:10, 82:12, 82:23, 83:21-22, 84:7-10, 84:13-14, 85:3, 85:11, 85:15, 86:18, 86:25, 87:4, 87:10, 87:15-17, 87:23, 88:4, 88:10, 89:15-22, 89:24, 90:10-11, 91:2-4, 91:8, 91:11-13, 91:17, 92:11	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal projects, data signals and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
22 23 24 25 26 27 28	Mao Decl., Exhibit 4 (Excerpts of the Deposition Transcript of Mandy Liu)  GRANTED as to the portions at:  14:18, 14:22, 14:24-25, 15:4, 15:7, 15:10-12, 15:14-15, 15:18, 15:25, 18:1, 18:3-4, 18:14, 18:18-20, 18:24, 19:3, 19:8, 19:11, 19:16, 19:22, 19:25, 20:1, 21:11-12, 39:1-2, 39:8, 39:10, 40:5-6, 40:9,	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course

1		40:11-12, 40:16-17, 41:7, 41:10, 41:21, 42:2, 42:8, 42:11, 42:16, 43:1, 43:15	of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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14  
15 **SO ORDERED.**  
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17 DATED: \_\_\_\_\_ HON. SUSAN VAN KEULEN  
18 \_\_\_\_\_ United States Magistrate Judge  
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